

ORIGINAL

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Attorneys for Plaintiffs

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

SEP 07 2007
at 11 o'clock and 0 min. M
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

| | |
|--|---------------------------------|
| TIARA ENGLE and PORTNER ORTHOPEDIC REHABILITATION, INCORPORATED, |) CIVIL NO. 04 00256 (SOM) (BK) |
| |) (Other Civil Action) |
| |) |
| Plaintiffs, |) NOTICE OF HEARING MOTION; |
| vs. |) PLAINTIFFS' FIRST MOTION TO |
| LIBERTY MUTUAL FIRE INSURANCE COMPANY; JOHN DOES 1-10; JANE DOES 1-10; DOE CORPORATION 1- 10; DOE PARTNERSHIPS 1-10; ROE "NON-PROFIT" CORPORATIONS 1-10; and ROE GOVERNMENTAL ENTITIES 1-10, |) COMPEL PRODUCTION OF |
| |) DOCUMENTS; MEMORANDUM IN |
| |) SUPPORT OF MOTION; |
| |) APPENDICES A-C; CERTIFICATE |
| |) OF SERVICE |
| |) |
| |) Hearing: |
| |) Date: _____ |
| |) Time: _____ |
| |) Judge: _____ |
| |) |
| Defendants. |) Trial Week: February 13, 2007 |
| |) |

NOTICE OF HEARING MOTION

TO: KENNETH J. MANSFIELD, ESQ.
Five Waterfront Plaza
4th Floor
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

Attorney for Defendant
LIBERTY MUTUAL FIRE INSURANCE COMPANY

NOTICE IS HEREBY GIVEN that Plaintiffs' First Motion to Compel Production Of Documents shall come on for hearing before The Honorable Barren Kurren, Judge of the above-entitled Court, in his courtroom at the United States District Court, District of Hawaii, 300 Ala Moana Boulevard, Honolulu, Hawaii, on _____, _____, at _____ .m., or as soon thereafter as counsel may be heard.

DATED: Honolulu, Hawaii, September 7, 2006.



ROY K. S. CHANG
HARVEY M. DEMETRAKOPoulos
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

TIARA ENGLE and PORTNER
ORTHOPEDIC REHABILITATION,
INCORPORATED,) CIVIL NO. 04 00256 (SOM) (BK)
Plaintiffs,) (Other Civil Action)
vs.)
LIBERTY MUTUAL FIRE INSURANCE)
COMPANY; JOHN DOES 1-10; JANE)
DOES 1-10; DOE CORPORATION 1-)
10; DOE PARTNERSHIPS 1-10; ROE)
"NON-PROFIT" CORPORATIONS 1-10;)
and ROE GOVERNMENTAL ENTITIES)
1-10,)
Defendants.)
)

PLAINTIFFS' FIRST MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Plaintiffs hereby move this Honorable court for an order compelling Defendant to produce documents responsive to Plaintiffs' First Request For Production of Documents and Plaintiffs' Second Request For Production of Documents. This motion is brought pursuant to F.R.C.P. Rule 37(a)(2)(B) and LR37.1. Movants' counsel hereby certifies that he has conferred in good faith with Defendant's counsel in an effort to secure the information or material without court action, and that both counsel attempted, in good faith, to limit the disputed issues and avoid the necessity for a motion. This

motion is based upon the attached memorandum in support of motion and appendicies, and the record and files herein.

DATED: Honolulu, Hawaii, September 7, 2006.



ROY K. S. CHANG
HARVEY M. DEMETRAKOPoulos
Attorneys for Plaintiff